STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
P.O. Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

July 13, 2004

CERTIFIED MAIL

Mr. Tevis Laspa
Pro-Tech Industries, Inc.
P.O. Box 933
Vancouver, WA 98666-0933

Dear Mr. Laspa:

RE: Temporary State Waste Discharge Permit for Industrial Wastewater Discharge from a Phosphatizing System - Temporary Permit No. ST 6194

On April 15, 2004, Pro-Tech Industries, Inc. (Pro-Tech) completed an application process for a State Waste Discharge Permit to the Department of Ecology (the Department). The Department did not act on that application within sixty (60) days. Under the provisions of Chapter 90.48.200 of the Revised Code of Washington (RCW), Pro-Tech has a Temporary State Waste Discharge Permit effective July 13, 2004. This temporary permit will remain in effect until such time as Ecology acts on the application.

EXPLANATION OF DISCHARGE LIMITATIONS

Under the temporary permit, Pro-Tech is permitted to discharge industrial waste water from a phosphatizing system into the Hazel Dell Sewer District (HDSD) sanitary sewer at a flow rate of 200 gallons per day (gpd) monthly average and 750 gpd daily maximum. Further, Pro-Tech must comply with local limits listed in Table 1.

Table 1 Hazel Dell Sewer District local limits

Parameter	Units	Limits [maximum for any 1 day]
pH	Standard units	6.0-9.0
Total Suspended Solids (TSS)	Milligrams per liter (mg/L)	300[1]
5-day Biochemical Oxygen	mg/L	240[2]

[1] After submitting a copy of the agreement to Ecology, Pro-Tech can enter into special agreements with the HDSD without violation on this permit if discharge exceeds TSS limit.

Table 1 Hazel Dell Sewer District local limits

Parameter	Units	Limits [maximum for any 1 day]
Demand (BOD_5)		
Arsenic	mg/L	0.1
Barium	mg/L	5.5
Beryllium	mg/L	90
Cadmium	mg/L	0.3
Chlorine Demand	mg/L	20
Chromium	mg/L	1.7
Copper	mg/L	2.2
Cyanide	mg/L	0.2
Iron	mg/L	10
Lead	mg/L	0.4
Mercury	mg/L	0.05
Nickel	mg/L	2.1
Selenium	mg/L	0.1
Silver	mg/L	0.1
Zinc	mg/L	2.3
Phenols or Cresols	mg/L	0.6
Oil and grease (total of petroleum and vegetable based)	mg/L	50

Pro-Tech is also required to comply with 40 CFR[3] 433.17, Pretreatment standards for new sources (PSNS) for metal finishing point source category, **Table 2**.

[2] After submitting a copy of the agreement to Ecology, Pro-Tech can enter into special agreements with the HDSD without violation on this permit if discharge exceeds BOD_5 limit.
[3] Code of Federal Regulations

Table 2 Pretreatment standards for new sources (PSNS) for metal finishing point category

Parameter	Maximum for any 1 day	Monthly average shall not exceed
	milligrams per liter (mg/L)	
Cadmium (T)[4]	0.11	0.07
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead (T)	0.69	0.43
Nickel (T)	3.98	2.38
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide (T)	1.20	0.65
TTO	2.13	

The term "TTO" in **Table 2** shall mean total toxic organics, which is the summation of all quantifiable values greater than .01 milligrams per liter for the following toxic organics:

Acenaphthene Acrolein Acrylonitrile Benzene Benzidine Carbon tetrachloride (tetrachloromethane) Chlorobenzene 1,2,4-Trichlorobenzene Hexachlorobenzene 1,2,-Dichloroethane 1,1,1-Trichloroethane Hexachloroethane 1,1-Dichloroethane 1,1,2-Trichloroethane 1,1,2,2-Tetrachloroethane Chloroethane Bis (2-chloroethyl) ether 2-Chloroethyl vinyl ether (mixed) 2-Chloronaphthalene 2,4,6-Trichlorophenol Parachlorometa cresol Chloroform (trichloromethane) 2-Chlorophenol 1,2-Dichlorobenzene 1,3-Dichlorobenzene 1,4-Dichlorobenzene 3,3-Dichlorobenzidine 1,1-Dichloroethylene 1,2-Trans-dichloroethylene 2,4-Dichlorophenol 1,2-Dichloropropane 1,3-Dichloropropylene (1,3-dichloropropene) 2,4-Dimethylphenol 2,4-Dinitrotoluene 2,6-Dinitrotoluene 1,2-Diphenylhydrazine Ethylbenzene Fluoranthene 4-Chlorophenyl phenyl ether 4-Bromophenyl phenyl ether Bis (2-chloroisopropyl) ether Bis (2-chloroethoxy) methane Methylene chloride (dichloromethane) Methyl chloride (chloromethane) Methyl bromide (bromomethane) Bromoform (tribromomethane) Dichlorobromomethane Chlorodibromomethane Hexachlorobutadiene Hexachlorocyclopentadiene Isophorone Naphthalene Nitrobenzene 2-Nitrophenol 4-Nitrophenol 2,4-Dinitrophenol 4,6-Dinitro-o-cresol N-nitrosodimethylamine N-nitrosodiphenylamine N-nitrosodi-n-propylamine Pentachlorophenol Phenol Bis (2-ethylhexyl) phthalate Butyl benzyl phthalate Di-n-butyl phthalate Di-n-octyl phthalate Diethyl phthalate Dimethyl phthalate 1,2-Benzanthracene ____(benzo(a)anthracene) Benzo(a)pyrene (3,4-benzopyrene) 3,4-Benzofluoranthene (benzo(b)fluoranthene) 11,12-Benzofluoranthene (benzo(k)fluoranthene) Chrysene Acenaphthylene Anthracene 1,12-Benzoperylene

[4] Total

(benzo(ghi)perylene) Fluorene Phenanthrene 1,2,5,6-Dibenzanthracene (dibenzo(a,h)anthracene) Indeno(1,2,3-cd) pyrene (2,3-o-phenlene pyrene) Pyrene Tetrachloroethylene Toluene Trichloroethylene Vinyl chloride (chloroethylene) Aldrin Dieldrin Chlordane (technical mixture and metabolites) 4,4-DDT 4,4-DDE (p,p-DDX) 4,4-DDD (p,p-TDE) Alpha-endosulfan Beta-endosulfan Endosulfan sulfate Endrin Endrin aldehyde Heptachlor Heptachlor epoxide ____(BHC-hexachloro- ____cyclohexane) ____Alpha-BHC ____Beta-BHC ____Gamma-BHC ____Delta-BHC ____(PCB-polychlorinated biphenyls) ____PCB-1242 (Arochlor 1242) ____PCB-1254 (Arochlor 1254) ____PCB-1221 (Arochlor 1221) ____PCB-1232 (Arochlor 1232) ____PCB-1248 (Arochlor 1248) ____PCB-1260 (Arochlor 1260) ____PCB-1016 (Arochlor 1016) ____Toxaphene ____2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)

DISCHARGE LIMITATIONS

If a parameter is listed in both tables, **Table 1** and **Table 2**, Pro-Tech is required to comply with the most stringent maximum for any 1 day, Table 3.

Table 3 HDSD and PSNS combined limits

Parameter	Units	Maximum for any 1 day	Monthly average shall not exceed
pH	Standard units	6.0-9.0	
Total Suspended Solids (TSS)	Milligrams per liter (mg/L)	300[5]	
5-day Biochemical Oxygen Demand (BOD_5)	mg/L	240[6]	
Arsenic	mg/L	0.1	
Barium	mg/L	5.5	
Beryllium	mg/L	90	
Cadmium (T)[7]	mg/L	0.11	0.07
Chlorine Demand	mg/L	20	
Chromium (T)	mg/L	1.7	1.71
Copper (T)	mg/L	2.2	2.07
Cyanide (T)	mg/L	0.2	0.65

[5] Pro-Tech can enter into special agreements with the HDSD without violation on this permit if discharge exceeds BOD_5 limit.

[6] Pro-Tech can enter into special agreements with the HDSD without violation on this permit if discharge exceeds TSS limit.

[7] Total

Table 3 HDSD and PSNS combined limits

Parameter	Units	Maximum for any 1 day	Monthly average shall not exceed
Iron	mg/L	10	
Lead (T)	mg/L	0.4	0.43
Mercury	mg/L	0.05	
Nickel (T)	mg/L	2.1	2.38
Selenium	mg/L	0.1	
Silver (T)	mg/L	0.1	0.24
Zinc (T)	mg/L	2.3	1.48
Phenols or Cresols	mg/L	0.6	
TTO[8]	mg/L	2.13	
Oil and grease (total of petroleum and vegetable based)	mg/L	50	

MONITORING REQUIREMENTS

A. Wastewater Monitoring

Pro-Tech shall monitor the industrial waste water from a phosphatizing system according to the following schedule:

Table 4 Monitoring requirements

Parameter	Units	Sampling Frequency	Sample Type
Flow	Gallons per day (gpd)	Continuous	Metered
pH	Standard units	Continuous	Metered
5-day Biochemical Oxygen Demand (BOD_5)	mg/L	Quarterly	Grab
Arsenic	mg/L	Quarterly	Grab
Cadmium (T)[9]	mg/L	Quarterly	Grab
Chlorine Demand	mg/L	Quarterly	Grab

[8] As defined before in this letter
[9] Total

Table 4 Monitoring requirements

Parameter	Units	Sampling Frequency	Sample Type
Chromium (T)	mg/L	Quarterly	Grab
Copper (T)	mg/L	Quarterly	Grab
Cyanide (T)	mg/L	Quarterly	Grab
Iron	mg/L	Quarterly	Grab
Lead (T)	mg/L	Quarterly	Grab
Nickel (T)	mg/L	Quarterly	Grab
Silver (T)	mg/L	Quarterly	Grab
Zinc (T)	mg/L	Quarterly	Grab
Phenols or Cresols	mg/L	Quarterly	Grab
TTO[10]	mg/L	Quarterly	Grab
Oil and grease (total of petroleum and vegetable based)	mg/L	Quarterly	Grab

B. Sampling and Analytical Procedures

Samples and measurements taken to meet the requirements of this temporary permit shall be representative of the volume and nature of the monitored parameters, including representative sampling of any unusual discharge or discharge condition, including bypasses, upsets and maintenance-related conditions affecting effluent quality.

Sampling and analytical methods used to meet the water and wastewater monitoring requirements specified in this temporary permit shall conform to the latest revision of the *Guidelines Establishing Test Procedures for the Analysis of Pollutants* contained in 40 CFR Part 136 or to the latest revision of *Standard Methods for the Examination of Water and Wastewater* (APHA), unless otherwise specified in this temporary permit or approved in writing by the Department of Ecology (Department).

C. Flow Measurement

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the quantity of monitored flows. The devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements are consistent with the accepted industry standard for that type of device. Frequency of

[10] As defined before in this letter

calibration shall be in conformance with manufacturer's recommendations and at a minimum frequency of at least one calibration per year. Calibration records shall be maintained for at least three years.

D. Laboratory Accreditation

All monitoring data required by the Department shall be prepared by a laboratory registered or accredited under the provisions of, *Accreditation of Environmental Laboratories*, Chapter 173-50 WAC. Flow, pH, and internal process control parameters are exempt from this requirement. pH shall be accredited if the laboratory must otherwise be registered or accredited.

REPORTING AND RECORDKEEPING REQUIREMENTS

Pro-Tech shall monitor and report in accordance with the following conditions. The falsification of information submitted to the Department shall constitute a violation of the terms and conditions of this temporary permit.

A. Reporting

The first monitoring period is July-September 2004. Monitoring results shall be submitted quarterly. Monitoring results obtained during the previous three (3) months shall be reported on the quarterly forms as provided, or otherwise approved, by the Department, and be received no later than the 15th day of the month following the completed reporting period, unless otherwise specified in this temporary permit. The report shall be sent to:

Industrial Unit Permit Coordinator
Department of Ecology
Southwest Regional Office – Water Quality
P.O. Box 47775
Olympia, WA 98504-7775

Discharge Monitoring Report forms must be submitted quarterly whether or not the facility was discharging. If there was no discharge or the facility was not operating during a given monitoring period, submit the form as required with the words "no discharge" entered in place of the monitoring results.

B. Records Retention

Pro-Tech shall retain records of all monitoring information for a minimum of three years. Such information shall include all calibration and maintenance records and all original recordings for continuous monitoring instrumentation, copies of all reports required by this temporary permit, and records of all data used to complete the application for this temporary permit. This period of retention shall be extended during

the course of any unresolved litigation regarding the discharge of pollutants by Pro-Tech or when requested by the Director.

C. Recording of Results

For each measurement or sample taken, Pro-Tech shall record the following information: (1) the date, exact place, method, and time of sampling; (2) the individual who performed the sampling or measurement; (3) the dates the analyses were performed; (4) who performed the analyses; (5) the analytical techniques or methods used; and (6) the results of all analyses.

D. Additional Monitoring by Pro-Tech

If Pro-Tech monitors any pollutant more frequently than required by this temporary permit, then the results of this monitoring shall be included in calculation and reporting of the data submitted in Pro-Tech's self-monitoring reports.

E. Noncompliance Notification

In the event Pro-Tech is unable to comply with any of the temporary permit terms and conditions due to any cause, Pro-Tech shall:

1. Immediately take action to stop, contain, and cleanup unauthorized discharges or otherwise stop the violation, and correct the problem;

2. Repeat sampling and analysis of any violation and submit the results to the Department within 30 days after becoming aware of the violation;

3. Immediately notify the Department and the local sewage treatment plant manager of the failure to comply; and

4. Submit a detailed written report to the Department within thirty days (5 days for upsets and bypasses), unless requested earlier by the Department. The report should describe the nature of the violation, corrective action taken and/or planned, steps to be taken to prevent a recurrence, results of the resampling, and any other pertinent information.

Compliance with these requirements does not relieve Pro-Tech from responsibility to maintain continuous compliance with the terms and conditions of this temporary permit or the resulting liability for failure to comply.

F. Dangerous Waste Discharge Notification

Pro-Tech shall notify the POTW and the Department in writing of the intent to discharge into the POTW any substance designated as a dangerous waste in accordance with the

provisions of WAC 173-303-070. This notification shall be made at least 90 days prior to the date that discharge is proposed to be initiated.

G. Spill Notification

Pro-Tech shall notify the POTW immediately (as soon as discovered) of all discharges that could cause problems to the POTW, such as process spills and unauthorized discharges (including slug discharges).

H. Maintaining a Copy of This Temporary Permit

A copy of this temporary permit shall be kept at the facility and be made available upon request to the Department inspectors.

S4. OPERATION AND MAINTENANCE

Pro-Tech shall at all times be responsible for the proper operation and maintenance of any facilities or systems of control installed to achieve compliance with the terms and conditions of the temporary permit.

If you have any questions about your temporary permit, please contact Jacek Anuszewski at (360) 407-6288.

Sincerely,

Kelly Susewind, P.E.
Southwest Region Manager
Water Quality Program

KS:JA:ljc

Cc: Douglas Arnold, Hazel Dell Sewer District
Jacek Anuszewski, Ecology
Laurie Conger, Ecology
Steve Eberl, Ecology